FILE NAME: Abex (ABX)

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revised answers, Abex in no way waives any rights it may have to challenge or appeal the Court's decision to overrule its objections, both general and specific, to these interrogatories. Abex reserves its right to supplement these revised answers should additional information become available.

SPECIFIC RESPONSES

2. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

(a) A list of each such claim by claimant's name, date filed and jurisdiction involved;

(b) A brief summary of the disposition of each such claim.

ANSWER: Abex is not currently aware of any claim fitting such a description.

6. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 to Plaintiff's First Set of Interrogatories have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER: Abex manufactured asbestos-containing automotive friction products in Detroit, Michigan from 1927 to 1955; Salisbury, North Carolina from 1974 to 1987; and Winchester, Virginia from 1947 to 1987. The existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. Some of the documents and records are organized by subject matter. Discovery is continuing. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained in all the documents. Abex will respond to

such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER: To the best of current knowledge, no Abex medical director or industrial hygienist made any recommendations concerning exposure by end users of Abex's friction products.

28. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

(a) The date each such library was established;

(b) The location of each library;

(c) The name(s) of the librarian(s) since 1930;

(d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;

(e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER: Abex did not maintain an official medical library, although its medical department did have various books and publications relevant to industrial medicine. Abex is aware that it received the American Industrial Hygiene Association Journal; Journal of Occupational Medicine; Occupational Health and Safety; Industrial Medicine, March 1944, and The Journal of the American Medical Association, April 2, 1949. Abex further states the existing business records and documents of Abex, which number in excess of three million, are preserved in the order in which they were found. Some of the documents and records are organized by subject matter. Discovery is continuing. There was never a central corporate filing system of Abex documents and there is no Abex employee who has personal knowledge of all the information contained

reasonably calculated to lead to the discovery of admissible evidenc Subject to and without waiving these objections, the followi persons have served as Abex medical director during the follow. .g time periods:

Lloyd Hamlin, M.D. (deceased)	1941-1961
Charles Blackwell, M.D.	1961-1976
Frederick Knoch, M.D. (deceased)	1976-1982
William Redman (interim)	1982
Dennis Egnatz, M.D.	1982-1987

27. State in detail the duties and responsibilities of such Medical Department.

ANSWER TO INTERROGATORY NO. 27: Abex objects to this interrogatory on the grounds that in seeking information concerning the personnel who oversaw the working conditions of Abex employees, it lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Abex medical department was established for the purpose of coordinating health and industrial hygiene practices in its plants and to investigate occupational disease and hazards encountered in the various plant locations.

28. Prior to 1965, did you, or any predecessor(s), ever at any time give persons who would be using or removing your asbestos-containing products instructions, to whom they were give, the dates they were given, and the manner of giving such instructions.

ANSWER TO INTERROGATORY NO. 28: To the best of current knowledge and belief, no.

29. If Defendant ever gave any warnings regarding its asbestos-containing products, please state:

(a) On what date did your company, or your predecessor(s), issue an order directing a warning to be placed on your asbestos-containing products, or containers and/or in sales literature;

(b) On what date was such warning actually first placed on your asbestos-containing products, containers or sales literature;

(c) on what date did your asbestos-containing products accompanied by such warning, first reach the insulation contractor?

(d) State the exact wording of the first warning.

(e) State the exact size of the warning printed on your asbestos insulation products, containers and/or in sales literature;

(f) Did your company, or its predecessor(s), dictate the exact size of the printed warning?

(g) Why did your company or its predecessor(s) place such warning on your asbestos-containing products, containers and/or sales literature?

(h) Did your company or its predecessor(s) place such warning on your asbestos-containing products, containers and/or sales literature because your received a directive, command, suggestions, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, from whom and on what date did you receive such directive, command, suggestion,, legal opinion or other type of communication.

(i) If the wording of the warning has ever been changed or altered, state when it was changed, and the exact change in the wording.

ANSWER TO INTERROGATORY NO. 29: Abex never manufactured and sold any asbestos-containing building products. Abex also claims the attorney-client privilege and the attorney work product doctrine. Subject to and without waiving these objections, in 1972, at the latest, Abex commenced the placement of warning labels on packages of its asbestos-containing automotive friction products. This label read as follows:

Caution
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious
Bodily Harm

Manufacturing Association (from an unknown period to 1949). Furthermore, Abex was a member of the Friction Materials Standards Institute (1949 to present); The American Industrial Hygiene Association ("AIHA"); The Air Pollution Control Association; the Manufacturers Alliance for Productivity and Innovation (formerly the Machinery and Allied Products Institute).

Abex is aware that some of its employees attended some meetings of the Industrial Hygiene Foundation ("IHF"), however, Abex has not found any information in its files evidencing a corporate membership in IHF.

32.1 Please state whether Defendant at any time has been a member of the Frictions Materials Standards' Institute, and if so, please identify the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, see answer to interrogatory No. 32. Abex further states that it lacks sufficient information to respond regarding publications of the Frictions Materials Standards' Institute.

32.2 Please state whether the Defendant at any time has been a member of The Brake Lining Manufacturers' Association, and if so, please identify the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: Abex objects to this interrogatory on the grounds that it is overly broad and burdensome. Subject to and without waiving these objections, see answer to interrogatory No. 32. Abex further states that it lacks sufficient information to respond